

Case 24-30281 Doc 509 Filed 12/19/25 Entered 12/19/25 11:33:07 Desc Main Document Page 1 of 1  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In Re:

Jointly Administered

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

### NOTICE OF OBJECTION TO CLAIM

Debtors, EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC filed an omnibus objection to your claim (**Doc. 504**) in this bankruptcy case.

**Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney if you have one.**

If you do not want the court to eliminate or change your claim, then on or before **Monday, January 26, 2026**, you or your attorney must file a written response to the objection explaining your position. Your attorney may file your response electronically in CM/ECF.

Alternatively, you may mail your response to the Court for filing. Send it to:  
U.S. Bankruptcy Court,  
655 First Avenue North, Suite 210,  
Fargo, North Dakota 58102.

If you mail your response to the Court for filing, you must mail it early enough so that the court will receive it on or before the date noted above.

**You must also send a copy to:**  
Attorney Steven R. Kinsella  
Fredrikson & Byron  
60 South Sixth Street, Suite 1500  
Minneapolis, MN 55402

If you file an objection or response, you must also attend the hearing on the objection, scheduled to be held on **Tuesday, February 3, 2026, at 10:30 A.M.** in Courtroom #3, Second Floor, Quentin N. Burdick United States Courthouse, 655 First Avenue North, Fargo, North Dakota. If you or your attorney do not take these steps, the Court will assume you do not oppose the objection to your claim and cancel the hearing.

Dated: December 19, 2025.

Sara E. Diaz, Clerk  
United States Bankruptcy Court  
Quentin N. Burdick United States Courthouse  
655 1st Avenue North, Suite 210  
Fargo, ND 58102-4932

By: /s/ Sharon Horsager

Sharon Horsager, Deputy Clerk

Sent electronically December 19, 2025 to Attorney Steven Kinsella for service.

Fill in this information to identify the case:

Debtor 1

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the: District of

Case number 24-30281 thru 24-30285

Official Form 410

## Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

### Part 1: Identify the Claim

1. Who is the current creditor?

Todd and Cindy Brown

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor

2. Has this claim been acquired from someone else?

☒ No

☐ Yes. From whom?

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Todd Brown

Name

6060 66th Ave N.W.

Number

Street

Blaisdell N.D. 58718

City

State

ZIP Code

Contact phone 701-240-5742

Contact email brownranch@jrt.com

Where should payments to the creditor be sent? (if different)

Cindy Brown

Name

Number

Street

City

State

ZIP Code

Contact phone 701-240-5875

Contact email some

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

☒ No

☐ Yes. Claim number on court claims registry (if known)

Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No

☐ Yes. Who made the earlier filing?

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor? ☒ No  
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim? \$ 107,198. - Does this amount include interest or other charges?  
☐ No  
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
Limit disclosing information that is entitled to privacy, such as health care information.

money loaned

9. Is all or part of the claim secured? ☒ No  
☐ Yes. The claim is secured by a lien on property.  
**Nature of property:**  
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
☐ Motor vehicle  
☐ Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
☐ Fixed  
☐ Variable

10. Is this claim based on a lease? ☒ No  
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff? ☒ No  
☐ Yes. Identify the property: \_\_\_\_\_

**12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?**

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

Amount entitled to priority

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☒ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09-10-2024  
MM / DD / YYYY

Todd W. Brown  
Signature

Print the name of the person who is completing and signing this claim:

Name Todd Warren Brown  
First name Middle name Last name

Title Owner Manager

Company Brown Grain and Cattle LLC  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 6060 66th Ave N.W.  
Number Street

Blaisdell N.D. 58718  
City State ZIP Code

Contact phone 701-240-5742 Email brownvauch@srt.c.

1-2-26

To Bankruptcy Court:

& Also Attorney Steven R. Kinsella:

This letter is a response to the notice of objection to claim letter we received on 12-19-2.

We're not exactly sure what the letter is implying but it is an insult to us that the court would suggest that we would consider walking away from our claim against EPIC. We expect the maximum amount back from our investment the the court can recover.

Signed:

POD & Cindy Brown  
Blended N.D. 5878